

Exhibit A

PRIVILEGED AND CONFIDENTIAL

DOCUMENT PRESERVATION NOTICE

TO: Middle East Forum Officers and Administrative Staff

FROM: Marc Fink, In-house Counsel

DATE: June 26, 2019

RE: Document Preservation Notice ("Notice")

The Middle East Forum (the "Forum") reasonably anticipates legal action concerning administrative staff (the "Matter"). The Forum strongly denies any wrongdoing and intends to defend itself vigorously.

In connection with the Matter, the Forum is legally obligated to take steps to preserve all potentially relevant information, including hard-copy documents and all forms of electronically stored information ("ESI") that could relate in any way to the topics listed in Section II below. You are receiving this Notice because you may possess, manage or control hard-copy documents and/or ESI that relate to these issues and that must be preserved.

Please read the entire Notice and follow the instructions carefully. **Your compliance is mandatory.** When you have finished reading the Notice, please follow the steps contained in Section IV below to acknowledge that you have read, understand and will comply with these instructions. If you have any questions regarding the contents of this Notice and how best to comply with it, including questions concerning which documents need to be preserved, please contact me by email at Fink@meforum.org.

This is a **privileged and confidential** communication. Please take precautions to keep this Notice confidential and do not share it with others. Please do not discuss this Matter with anyone, including other employees, **except me**.

The obligations described in this Notice supersede any routine retention or discard procedures that you currently follow and are ongoing until you are explicitly directed otherwise that this Notice is no longer in effect.

I. YOUR OBLIGATIONS

Until further written notice, you must not destroy, discard, alter, modify, or delete any paper documents or ESI that relate to the topics listed in Section II below and that were created, modified, sent, or received on or after June 1, 2016, including drafts, work papers, personal notes, emails (both sent and received), and other electronically stored documents. This obligation applies both to existing documents and to documents that you may create or receive in the future.

If you are concerned that certain potentially relevant information may be deleted or destroyed in the ordinary course of business, please contact me immediately.

For now, you are only obligated to keep these materials as-is. You should not begin to segregate or collect relevant documents at this time as doing so may alter the documents' metadata.

II. SUBJECT MATTER OF MATERIALS TO BE PRESERVED

Any potentially relevant information (in whatever form it exists, whether paper or ESI) regarding **administrative employees** must be preserved. This includes, but is not limited to, all communications, documents, and/or information regarding: (i) job performance; (ii) professional interactions; and (iii) personal interactions (the “Subject Matter”).

You should interpret the Subject Matter broadly. If you have any doubt or questions regarding whether certain materials should be preserved, always err on the side of caution and preserve the information.

III. POSSIBLE FORMS AND LOCATIONS OF RELEVANT INFORMATION

Information in both paper and ESI format should be retained if it relates to the Subject Matter of the dispute described above, **including any relevant documents or information that you create or receive after the date of this Notice**. All information related to the topics above, including both working/draft copies and formal business records, must be retained. Likewise, you must retain any relevant documents that you may have inherited from another former or current employee or that you may have transferred to a personal device to facilitate working remotely.

The following materials must be saved if they contain potentially relevant information, regardless of where they may physically reside:

- Emails and attachments; calendar entries, meeting invitations, and contacts; Microsoft Word, Excel, PowerPoint, Access, Project, and Visio documents; PDF files; photographs and images; e-faxes; text messages, instant messages, Telegram messages, other electronic messages, and voicemails; video, audio, and other multimedia files; databases, data extracts, and reports; and social media content.
- Hard-copies of letters, reports, agreements, internal/external communications, correspondence, memoranda, calendars, journals, summaries or records of conversations or work assignments, formal/informal notes (typed or handwritten), envelopes, books, bulletins, and diaries, including copies of such documents that are not identical duplicates of the originals (e.g., with highlighting, handwritten comments, or margin notations).

Relevant documents may be found on a diverse array of data sources, including but not limited to:

- Corporate desktop or laptop computers; personal or departmental file shares; server-side email mailboxes (including one’s “Inbox,” “Deleted Items,” “Sent Items,” or any other subfolder); email archive files (e.g., PST or NSF files); optical disks (including CDs and DVDs), removable thumb drives or external hard drives, and other types of portable electronic storage media; backup tapes and other disaster-recovery systems; and internet, blog, intranet, extranet, portal, social media, or cloud-based sites and services; and Forum-issued mobile devices.
- Personal computers; personal iPhones or other smartphones; personal iPads or other tablet devices; personal email accounts (e.g., Gmail, Yahoo, Hotmail); thumb drives; social media sites (e.g., Facebook); and cloud-based storage locations (e.g., Dropbox).

IV. CERTIFICATION OF COMPLIANCE

Compliance with the procedures outlined in this Notice is critical, and any failure to comply could result in serious ramifications for the Forum and for you. Within three (3) business days of receiving this Notice, please send me an email stating that you acknowledge receiving this Notice and that you understand your obligations.

Thank you for your prompt attention to, and ongoing cooperation with, this matter.

Exhibit B

4:47 31 f s p d 28

< factory

X

v

^

Ok. He can text me
or if he has Tricias.
Did you unhook all if
your personal shit?
Maybe we should
google how to
return it to **factory**
settings?

11:05 AM



I did it already!

11:06 AM



Ready to go

11:07 AM

11:07 AM

Ok good!!



I'll have him text
you

11:07 AM

Have him trip and
throw it across the
lobby and mess



Exhibit C

FORENSIC MEMORANDUM**CONTACT**

TO: Sidney Gold
FROM: Jamente M. Cooper
SUBJECT: Middle East Forum, MacBook Pro Device Reset Analysis - Lisa Barbounis
DATE: August 28, 2020
CC: Luke La Rocca

ENGAGEMENT & SCOPE

Contact analyzed one forensic image to provide additional analysis surrounding the Mac operating system reset. The forensic analysis results are provided in more detail below.

EVIDENCE SUMMARY

On November 11, 2019, Jamente Cooper of Contact obtained possession of a Apple MacBook Pro (Serial # FVFXQ5KKHV27) via FedEx. The MacBook Pro was assigned Evidence Identification Number (EIN) 10553-E0002. A forensic image was made of 10553-E0002 and saved onto a Toshiba hard drive (Serial # 79P2TOJATTRG) assigned EIN 10553-Backup001. The forensic image named 0542-E002-Barbounis_Lisa-20200103.E01 is a single E01 file stored on 10553-Backup001.

Mr. Cooper generated a duplicate, working copy image which was saved onto a Toshiba hard drive (Serial # X9HCT0RRTSCG). This storage device was assigned EIN 10553-Backup005. On August 25, 2020, Mr. Cooper removed the working copy drive (EIN 10553-Backup005) from evidence storage and connected it to a Mac workstation in Contact's forensic lab. All subsequent steps in the analysis process have been performed using this copy of the image.

IMAGE VERIFICATION

Mr. Cooper loaded the 10553-E0002 image into BlackLight and RECON Lab forensic suites and verified the data extraction. The verification hash of EIN 10553-E0002 is the following:

MD5: 21B72CF4E028EE826FC621338E4BD29C

SHA1: 1D40AD7AF9E1F374F58BFOF4E9FBB5761C8946EE

DEVICE ARTIFACTS

The following information is associated with EIN 10553-E0002 (see Figure 1):

- Internal Storage: Apple SSD SM0128L (Serial # C08842405CNL65YA8)
- File System: APFS with approximately 113 GB of storage capacity

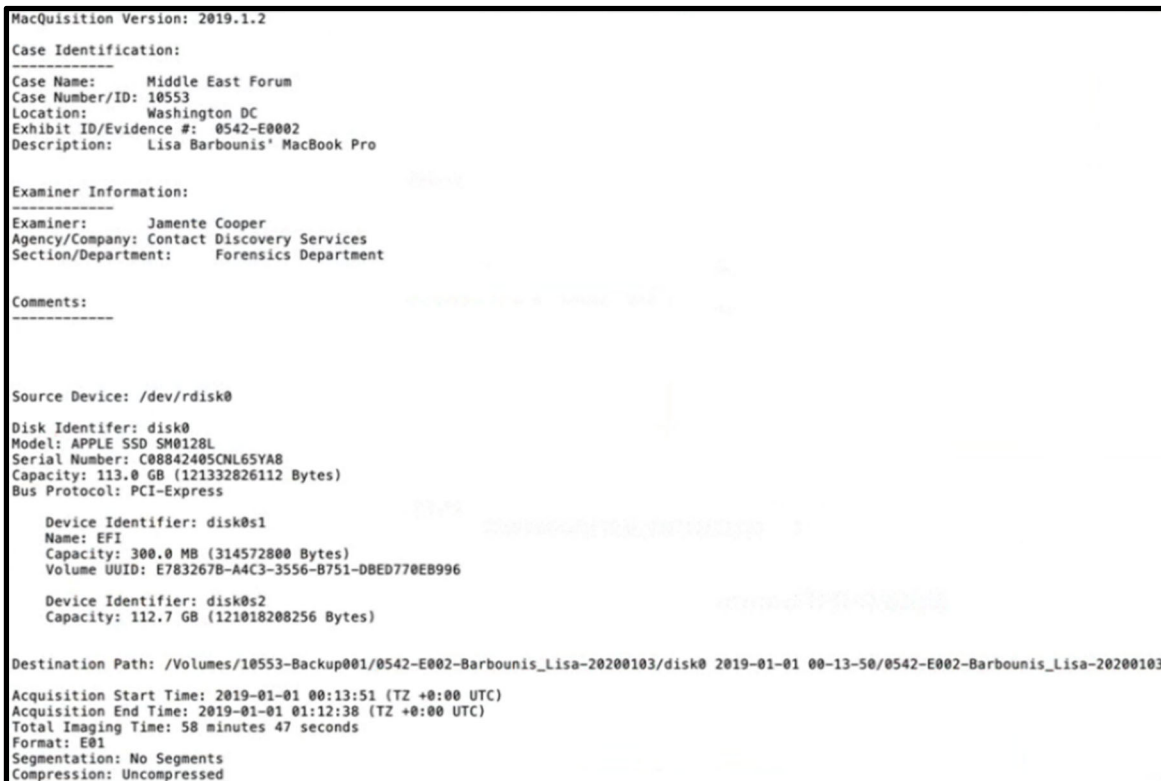


Figure 1. Screenshot from MacQuisition extraction summary.

The Operating system installed on the Mac is macOS Mojave (Version 10.14.6) (see Figure 2).

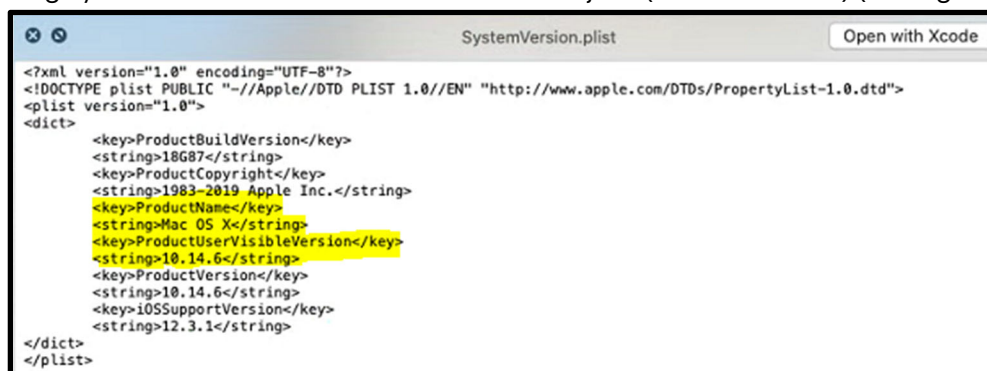


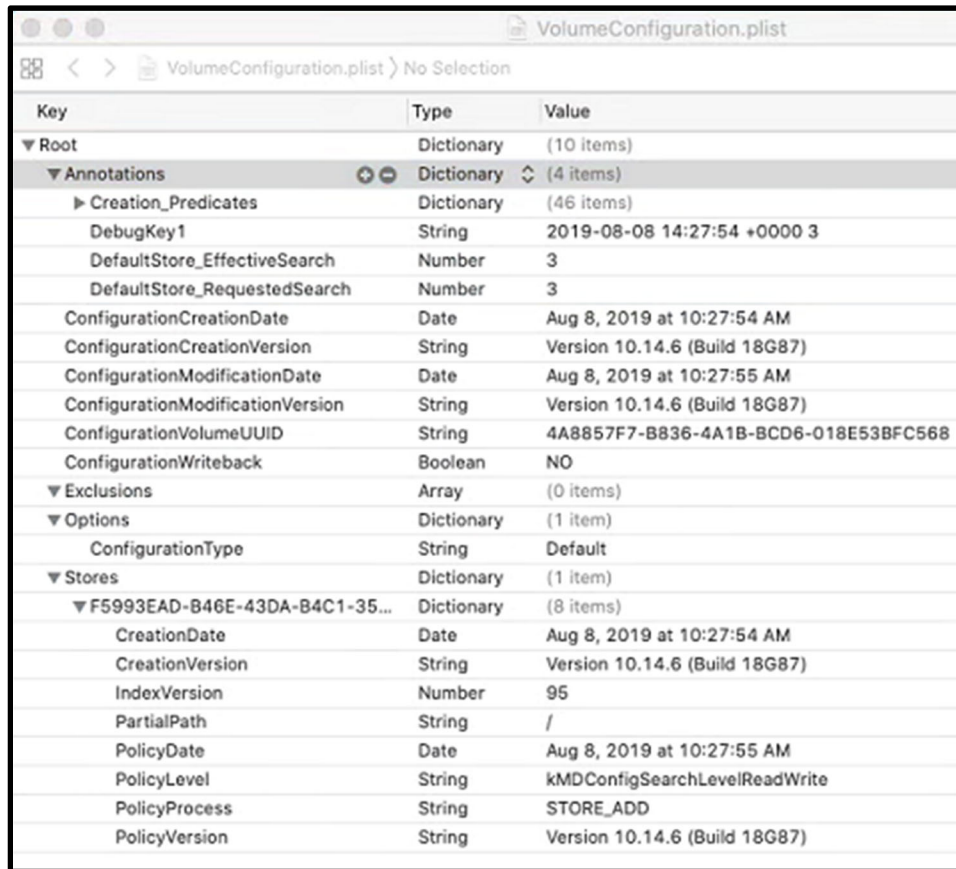
Figure 2. Screenshot from RECON Lab of SystemVersion.plist.

There were no user generated profiles present within the forensic image.

FORENSIC ANALYSIS

Mr. Cooper focused the forensic analysis on the critical macOS system files which are generated whenever a Mac is setup. Mr. Cooper identified the Transparency Consent and Control system database (TCC.db) and the Mac file system events directory (.fsevents). The Mac Spotlight indexing directory (.Spotlight-V100) maintains the VolumeConfiguration.plist, which stores the

logical volume's metadata (see *Figure 3*). The TCC.db, .fseventsd, and VolumeConfiguration.plist were created around August 8, 2019 2:27 PM UTC. These files are regularly created during an operating system installation or re-installation.



Key	Type	Value
Root	Dictionary	(10 items)
Annotations	Dictionary	(4 items)
Creation_Predicates	Dictionary	(46 items)
DebugKey1	String	2019-08-08 14:27:54 +0000 3
DefaultStore_EffectiveSearch	Number	3
DefaultStore_RequestedSearch	Number	3
ConfigurationCreationDate	Date	Aug 8, 2019 at 10:27:54 AM
ConfigurationCreationVersion	String	Version 10.14.6 (Build 18G87)
ConfigurationModificationDate	Date	Aug 8, 2019 at 10:27:55 AM
ConfigurationModificationVersion	String	Version 10.14.6 (Build 18G87)
ConfigurationVolumeUUID	String	4A8857F7-B836-4A1B-BCD6-018E53BFC568
ConfigurationWriteback	Boolean	NO
Exclusions	Array	(0 items)
Options	Dictionary	(1 item)
ConfigurationType	String	Default
Stores	Dictionary	(1 item)
F5993EAD-B46E-43DA-B4C1-35...	Dictionary	(8 items)
CreationDate	Date	Aug 8, 2019 at 10:27:54 AM
CreationVersion	String	Version 10.14.6 (Build 18G87)
IndexVersion	Number	95
PartialPath	String	/
PolicyDate	Date	Aug 8, 2019 at 10:27:55 AM
PolicyLevel	String	kMDConfigSearchLevelReadWrite
PolicyProcess	String	STORE_ADD
PolicyVersion	String	Version 10.14.6 (Build 18G87)

Figure 3. Screenshot from RECON Lab of VolumeConfiguration.plist.

The next artifacts analyzed were the system log files in order to determine a start date and time. Macs regularly log system activities such as file creations and modifications so it is noteworthy that the absence of log files prior to a specific time frame would provide a timeline of when the device reset took place. Mr. Cooper reviewed all accessible FS Events logs, Apple System logs, and Unified logs within the forensic image. It should be noted that the no log files were timestamped prior to August 8, 2019 2:26 PM UTC (see *Figure 4 and 5*).

Registry
Spotlight
Dictionary
Applications
System Logs
Memory

File System Logs

.sevents

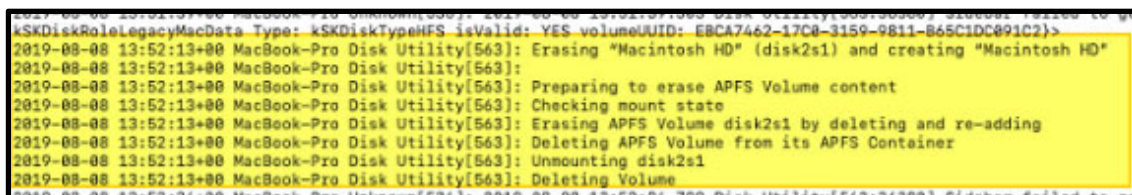
System Logs

ASL

Unified Log

Date	Message	Process Name	Process Path	Type
2019-08-08 08:26:45 (GMT-6)	mem_actual: 0x200000000	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	PMAP: PCID enabled	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	PMAP: Supervisor Mode Execute Protection enabled	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	PMAP: Supervisor Mode Access Protection enabled	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	Darwin Kernel Version 18.0.0: Thu Jun 20 18:42:21 PDT 2019; root:xnu-4903.270.4~4/RELEASE_ARM64	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	pmmap_startup() delaying init/free of page nums > 0x200000	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	pmmap_startup() init/release time: 27208 microsec	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	pmmap_startup() delayed init/release of 606540 pages	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	vmm_page_bootstrap: 1409061 free pages, 671707 wired pages, (up to 606540 of which are delayed free)	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	kext submap [0x0 - 0x0], kernel text [0x0 - 0x0]	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	zone leak detection enabled	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	zalloc: allocating memory for zone names buffer	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	"vm_compressor_mode" = 4	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	oslog_init completed, 16 chunks, 8 to pages	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	standard timeslicing quantum is 10000 us	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	standard background quantum is 25000 us	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	WQ[wq_init]: init linktable with max:262144 elements (8388608 bytes)	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	WQ[wq_init]: init prepost table with max:262144 elements (8388608 bytes)	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	mig_table_max_displ = 51	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	TSC Deadline Timer supported and enabled	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	kdb_core_zlib memory 0x7000	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	ACPI:	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	ACPI:	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	RSDP 0x00000000088FFE014 000024 (v02 APPLE)	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	RSDP 0x00000000088FFE014 000024 (v02 APPLE)	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)		kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	ACPI:	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	ACPI:	kernel	/kernel	Default
2019-08-08 08:26:45 (GMT-6)	XSDT 0x00000000088FF00FA 00000C (v01 APPLE Apple00 00000000 010000013)	kernel	/kernel	Default

Lastly, a review of the install.log file will display the most recent installation of the present operating system. The install.log located in /var/log directory annotates in verbose detail the operating system installation information associated with the current operating system. Mr. Cooper observed around 1:52 PM UTC on August 8, 2019, that MacBook-Pro Disk utility was erasing a volume identified as “Macintosh HD” and creating a new “Macintosh HD” volume on the same hard drive. This action would remove any data which was previously on the hard drive to accommodate the new volume for a Mac operating system re-installation (see *Figure 6*).



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SUMMARY OF FINDINGS

The EIN 10553-E0002 forensic image was analyzed with BlackLight and RECON Lab. The analysis determined:

- The MacBook Pro with Serial # FVFXQ5KKHV27 had a Mac OS installation of August 8, 2019 at approximately 2:00 – 2:30 PM UTC.
- The MacOS installation deleted a previously installed APFS “Macintosh HD” prior to the reinstallation of macOS Mojave.
- No user-generated profiles were created on the MacBook Pro.
- No log files were present on the MacBook Pro prior to August 8, 2019 2:00 PM UTC.

The results of this analysis suggest a factory reset was performed on the device.

TOOLS

BlackLight Version 10.1.1

RECON Lab Version 1.3.9 (A4)

ATTACHMENTS

None

ABOUT CONTACT

Contact Discovery Services, LLC is a national ISO:27001 certified digital forensics and electronic discovery firm with offices in Washington D.C., Los Angeles, New York, Boston, and Miami. Contact provides end-to-end litigation support services to the world's top law firms and corporations and has been a trusted partner on a wide range of litigation matters. Contact regularly engages in digital forensic, data processing, analysis, and information management activities supporting large, complex litigations and internal investigations.

_____/s/ Jamente Cooper
Jamente M. Cooper
Lead Forensic Analyst

_____/8/28/2020
Date

Address:

Contact Discovery Services, LLC
1100 13th St NW Suite 925
Washington, DC 20005

Exhibit D



Chats



Tricia McNulty

private

416 messages



Kyle Shideler

private

8 messages



OFFICE STAFF+DP

group

50 messages



Lisa Barbounis

private

1299 messages



Legal project radio show

group

12 messages



EJ Kimball

private

16 messages



Sammy

private

231 messages



Cinnamon Stillwell

private

31 messages



Danny

private

12 messages

Exhibit E



Lisa Barbounis

26 July 2019



Lisa Barbounis

15:03

I'm working from home today and I can't remember the media email

Meverminf

15:04

30 July 2019



Delaney Yonchek

17:54

Did you not get guests for tomorrow? Gary asked me.



Lisa Barbounis

17:56

You had the one and I asked the one Gregg wanted no response

31 July 2019



Delaney Yonchek

08:27

Is the iPad charged? Gary's grabbing everything this morning



Lisa Barbounis

08:28

Yes.



Delaney Yonchek

08:29

Incoming (11 seconds)



Delaney Yonchek

09:57

Which channel is the mic?

1 August 2019



Delaney Yonchek

11:02

Where do you keep the archive of Monday articles